July 15, 2024

Hon. Magistrate Parker
United State District Court, S.D.N.Y.
500 Pearl Street, Courtroom 17D
New York, NY 10007
CASE: 19-cv-11764
<u>RE</u>: *Defendant-Campaign withholding of two specific documents*

Your Honor,

I am the Plaintiff in the aforementioned case. I write regarding the fact that Defendant-Campaign is withholding documents that are responsive. These are documents referenced in another case (two documents total), which are in possession of the Defendant-Campaign.

I have asked the Defendant-Campaign to turn over the documents, numerous times, to avoid unnecessary motion practice and unnecessary letters to the Court but my attempt to resolve this efficiently has been met with silence or with evasive responses.

Prior counsel, Jared Blumetti, produced a document (also from another case, responsive to mine) when it was brought to his attention. However, current counsel is not employing the same efficient cooperation.

I have tried for weeks to obtain the documents, starting in *May*. Mr. Gavenman responded he would look into and get back me, but never did. I then followed up again last month (June) and, again, this month (July 6th). Mr. Gavenman responded again requesting that which I had already provided – that I explain why the two documents are relevant. I did explain, again, and yet, again, Mr. Gavenman provided no further response.

The documents are relevant to hostile work environment and the Campaign's ineffective Human Resources department. Both of the emails are explicitly and solely about me and reference me by name. There is no doubt they are responsive. (I do not list further information so as to respect the confidentiality of the production process, should Mr. Gavenman wish to label the document confidential, although it is not particularly sensitive.)

It is unfortunate that I am forced to bother the Court with this, versus Mr. Gavenman simply providing the two documents, as Mr. Blumetti, his predecessor, did.

Respectfully and humbly submitted,
<u>*s/ Arlene Delgado*</u>
Plaintiff, *pro-se*